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June 18, 2019

VIA ECF

The Honorable Nancy E. Brasel
United States District Court Judge
Warren E. Burger Federal Building
and U.S. Courthouse – Ste. 348
316 North Robert Street
St. Paul, MN 55101

RE: Johannessoehn, et al. vs. Polaris Indus. Inc., File No. 16-CV-3348-NEB-LIB

Dear Judge Brasel:

My firm and I, together with Kirkland & Ellis LLP, represent Polaris Industries Inc., the defendant in the above captioned action pending before the Court. This is a putative nationwide class action brought on behalf of purchasers of Polaris Sportsman all terrain off-road vehicles from six different states.

Polaris will be filing its class-related *Daubert* motion this Friday, June 21. I am writing to request an additional 4,000 words for Polaris' combined opening and reply briefs in support of this motion, putting Polaris' total words allotted for the motion at 16,000 rather than the 12,000 allotted in D. Minn. L.R. 7.1(f)(1)(B). Polaris respectfully requests this word count extension in order to address highly complex issues involving class-wide damages based on purported conjoint surveys and market simulations performed by two of plaintiffs' proffered experts.

Polaris has conferred with plaintiffs' counsel, who oppose Polaris' request. Polaris does not oppose a corresponding increase of 4,000 words for plaintiffs' opposition should the Court grant this request. Polaris thanks the Court for its consideration of this request.

The Honorable Nancy E. Brasel
June 18, 2019
Page Two

Respectfully submitted,

/s/ Wendy J. Wildung
Wendy J. Wildung

cc: Counsel of Record (via ECF)